

From: Prof Bill Neill <proev@mill.net>
To: K1DOM.K1PO2(JBOLEY)
Date: Tue, Jul 27, 1999 12:06 AM
Subject: e filing CC 99-200

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Dear Judy Boley: July 27, 1999.

JUL 27 1999

Please accept this OFFICIAL ELECTRONIC FILING OF THE ATTACHED FILE
TITLED: BNEILLCP. The Comments are titled:

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

COMMENTS ON AND DIALING PROPOSAL FOR THE EXPANDED USE OF HEXADECIMAL
PHONE NUMBERS UNDER A NEW *INDUSTRY* CLASS OF SERVICE THAT WILL
ALLEVIATE THE AREA CODE ASSIGNMENT CRUNCH AND PROVIDE SUBSTANTIAL
EXPANSION OF ALREADY AVAILABLE NUMBERS IN ALL LOCATIONS AND IN ALL AREA
CODES AND ALL AT NO COST TO ANYONE

Attached to this email message is this file of the Comments of Prof Bill
Neill, 140 pages long, on CC Docket No. 99-200, Titled Numbering
Resource Optimization.

This file is being submitted as a MACINTOSH MS-Word (MS-Office 98)
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versions, ALL ARE FOR MACINTOSH PLATFORM.

IF YOU HAVE A PROBLEM RESOLVING THIS FORMAT OR FILE PLEASE CONTACT ME,
ASAP.

THANK YOU,

PROF BILL NEILL.

<proev@mill.net>

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Dear FCC Clerk:

July 27, 1999.

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COMMENTS ON AND DIALING PROPOSAL FOR THE EXPANDED USE OF
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PROF BILL NEILL.

<proev@mill.net>

Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C.
20554

<p>In the Matter of</p> <p>Numbering Resource Optimization</p> <p>99-200</p>	<p>CC Docket No.</p>
<p>Connecticut Department of Public Utility Control Petition for Rulemaking to Amend the Commission's Rule Prohibiting Technology-Specific or Service-Specific Area Code Overlays</p>	<p>RM No. 9258</p>
<p>Massachusetts Department of Telecommunications and Energy Petition for Waiver to Implement a L-99-17 Technology-Specific Overlay in the 508, 617, 781, and 978 Area Codes</p>	<p>NSD File No.</p>
<p>California Public Utilities Commission and the People of the State of California Petition for L-99-36 Waiver to Implement a Technology-Specific or Service-Specific Area Code</p>	<p>NSD File No.</p>

COMMENTS ON AND DIALING PROPOSAL FOR THE EXPANDED USE OF
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Essentials of this document were also submitted to the California
Public Utilities Commission, In the Matter of Commission Order
Instituting Rulemaking on the Commission's Own Motion Regarding
Commission Policy on Area Code Relief, Rulemaking R.98-12-014,
(Filed December 17, 1998).

92163-3666

Prof Bill Neill, In Pro Per
Private Citizen, Professional Engineer
P. O. Box 33666, San Diego, California

Telephone: 619/231-1313, Email:

proev@mill.net

Website:

www.webcom.com/electro7/hex/hex.html

Pro Per Attorney

for

July 27, 1999

Prof Bill Neill

Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C.
20554

In the Matter of

Numbering Resource Optimization
200

CC Docket No. 99-

COMMENTS ON AND DIALING PROPOSAL FOR THE EXPANDED USE OF
HEXADECIMAL PHONE NUMBERS UNDER A NEW ~~INDUSTRY~~ CLASS OF SERVICE
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Commission Policy on Area Code Relief, Rulemaking R.98-12-014,
(Filed December 17, 1998).

I file these comments on this date, in the Federal Communications
Commission's Numbering Resource Optimization, CC Docket No. 99-
200. This is in direct support of a separate filing by the
California Public Utilities Commission listed as:

California Public Utilities Commission and the People
of the State of California Petition for Waiver to
No.

NSD File

Prof Bill Neill's Comments & Proposal on Hexadecimal Phone Numbers 7/27/99

Page 2

Implement a Technology-Specific or Service-Specific | L-99-
36
Area Code (PLAIN) |

which seeks to pave the way for implementation of this very issue as the panacea of all area code and numbering needs for more than 100 years in the future.

**** A Comprehensive Treatise on the Hexadecimal Number Perspective**

SUMMARY - Proposed is the creation of a third class of telephone service, to be known as the ~~Industry~~ Class. It is to be used as the avenue through which expanded public and private uses of already existing HEXADECIMAL Phone Numbers are made. All aspects of this are discussed in detail, but in a way that non-technical persons can grasp. The scope of this discussion is exhaustive, but necessary.

1. The cost benefit considerations are established and discussed throughout this writing, along with several specific proposals that are outlined in detail. The whole idea of the relation of the services to their hidden number usage is explored. We are reminded that the public already paid for this HEXADECIMAL system several years ago and that aspect of free-for-the-using is presented. This proposal has nothing whatever to do with vanity phone numbers!

2. No change is proposed or being made by the Neill Plain to any PUBLIC DECIMAL Number. What we are doing is simply using ~~the~~ rest of the numbers, ~~a~~ a very reasonable action and one that is long over due. The depth and breadth of it all, the implementation of this proposal will completely eliminate the need for land line phones, or portable cellular, PCS, or digital, or analogue phones to have to be assigned phone numbers that would need to be dialed using 1+10, or 10 digit phone numbers, and this plain will likely eliminate the need for all overlays

and recent splits in California and the nation, as well.

2. Other services including, alphanumeric and tone pagers, faxes, and other PUBLIC HEXADECIMAL Phone services will not necessarily be placed in large HEXADECIMAL overlay area codes. This is because we have several billion numbers available already, just in California alone, that presently are not being used. The very absurdity of it all is astounding!

3. Furthermore, all these benefits can be realized in just several months, essentially now, and every aspect of number assignment gets better with time. The full blossoming of HEXADECIMAL dialing is yet to come. We are but in the bud forming stages as we speak!

4. No one else has offered any solution anywhere near the effectiveness provided by INDUSTRY Service and HEXADECIMAL PHONE NUMBERS. This solves the NUMBER crunch and significantly extends time to the expected exhaust of North American Number Plain to nearly 100 plus years.

5. Finally, rule making and establishing policy on this issue along with actions that are to be taken for the immediate implementation at all levels of government are well defined and also presented in extensive detail. Policy on area code relief is a multifaceted issue.

6. AUTHOR'S NOTE - This writing delves into Hexadecimals with the knowledge that readers are from very diverse backgrounds, but they still have the right to expect to be able to understand this issue. With that in mind, please take note that in some cases, over simplification of the explanation or deliberately leaving out a not-to-important fact or part so as to concentrate on the big picture was done, because its value outweighs the omission deliberately made. Hopefully, this will not be judged by the author's peers as intellectually dishonest! Also, I have learned

from many years of teaching that readers need reinforcement from time to time as they read to understand a whole new concept, with this in mind, I have deliberately repeated some aspects in different points of view and in different locations in this writing: if you think you got it, read it anyway!

6. And finally, expect lots and lots of diversionary responses from your friendly telephone companies and others. It has always been their ploy to raise every issues to every possible height and then endlessly do it all over again, because as they see it, every day that results in a delay on an issue, is a day that they make a million dollar profit. There will be presented all sorts of can't do this or can't do that, well folks, don't you believe it, not even for a second! Check out the issues presented in this proposal, yourself. Accept the challenge, get competent communication engineering advice! Then, but only then, please do respond to the issues presented. I have deliberately asked and answered questions in anticipation of the responses to be received. This is not only to clarify a point or issue, but it will reduce the flurry of paperwork that is to follow.

7. PREFACE - Because this issue is more technical than the average pleading, organizational assistance is provided by way of a TABLE OF CONTENTS and this writing is divided into: Part 1, Introduction and Definitions; Part 2, Discussion and Applications; Part 3, Conclusions and Recommendations, Part 4, Rulemaking and Government, Part 5, Prayer and Submission. These parts should be especially helpful to those in the audience, without technical skills, who want to attain a better grasp of the ramifications of this very important issue by keeping a clear mind, that is well focused on the subject at hand.

8. It is reported that there are 8 billion humans on this earth. California alone has about 10 billion PHONE NUMBERS as of today. What on earth are they NOT doing that still makes necessary the new requirements for dialing 10 digits to call

home, which is only a block away! ET did it better with cooking utensils and a record player, but then he was not being radiated by a telco microwave link!!!

8. There is a dignity, a profound beauty to this HEXADECIMAL thing; it's not unlike the atomic arrangement of electrons that define us all or the electromagnetic spectrum that forms the basis of communications. The difference is God created the electrons and the spectrum, man created the 4 x 4-tone pad, they are all profoundly important to our every aspect of life.

9. NETWORK SECURITY - As you may well imagine the issue of security is vital to any changes in the number base. But in fact, increasing the number base from 10 symbols to 16 symbols is substantially increasing the security of the network. The more symbols there are, the harder the lock is to pick. So, converting to the complete use of all HEXADECIMAL numbers is to everyone's advantage and reduces the probability of unauthorized access substantially.

10. These comments should also be very helpful to the rule makers, since the very act of rule making requires their competence, attention to detail, extensive knowledge of the subject, exercise of very good judgment, and finally, the taking of deliberate action in the public interest. It's better to debate a question without settling it, than to settle a question without debating it. We're off on a wonderful adventure, I hope you enjoy it.

11. TABLE OF CONTENTS

C O N T E N T

P A G E

SUMMARY

2

AUTHOR'S NOTE

3

PREFACE

4	
NETWORK SECURITY	
5	
TABLE OF CONTENTS	
6	
12. 1: INTRODUCTION AND DEFINITIONS -----	
13. --- INTRODUCTION ---	
FORWARD	
13	
THE NEILL PROGRAM	
13	
WE ARE NOT ALONE	
13	
INTERNET PUBLICATIONS ABOUND	
14	
HEXADECIMAL PHONE NUMBERS	
14	
HEX ON THE BLACK KEYS	
14	
HARVESTING THE HEXADECIMAL FRUIT	
15	
EXPANDING EXISTING USE	
15	
EXHAUSTING NANP	
15	
ON THE RECORD AT LAST	
15	
SUPPORT IS WHERE YOU FIND IT	
15	
EXHAUSTIVE EXPLORATION	
16	
14. --- DEFINITIONS ---	
CENTRAL OFFICE	
16	
DECIMAL NUMBER SET	
16	

DIRTY SET	
16	
DTMF - Dual Tone Multiple Frequency	
17	
ENLIGHTENED PUBLIC	
17	
EXHAUST	
17	
EXPANDED USE OF HEXADECIMALS	
17	
GENERAL PUBLIC	
17	
HEXADECIMAL NUMBERING SYSTEM AND SET	
17	
HEXADECIMAL SYSTEM COUNT	
17	
INDUSTRY CLASS OF SERVICE	
18	
LINE CARD	
18	
NANP - North American Number Plain	
18	
NUMBER SETS.	
18	
PHONE CLASSES OF SERVICE	
18	
POTS	
18	
PRIVATE HEXADECIMAL PHONE NUMBERS	
18	
PUBLIC CLASSIFIED	
18	
PUBLIC DECIMAL NUMBERS	
18	
PUBLIC HEXADECIMAL PHONE NUMBERS	
19	

SEPARATION OF SERVICES

19

SERVICE SPECIFIC

19

SURCHARGE

19

SWITCH ROOM

19

TECHNICAL PUBLIC

19

TECHNOLOGY SPECIFIC

19

TONE FACTS

19

TOUCH TONE

19

REFERENCE LIST OF GOOD CONSERVATION CATEGORIES

20

15. 2: DISCUSSION AND APPLICATIONS -----

16. --- DISCUSSION ---
PERSONAL DISCLAIMER

21

COMMENTS OR PROPOSAL DECLARED INAPPROPRIATE IN PART

21

EXAMPLE STANDARDS

21

PERSONAL GOAL

21

PROPOSAL INCLUSIVE

22

INDUSTRY CLASS OF SERVICE TO BE CREATED

22

ELECTED OFFICIALS AND THE LEGISLATURE

25

FEDERAL OBSTACLES

25

THE NORTH AMERICAN NUMBER PLAIN

25

CURRENT STATE LEGISLATION

26

All HEXADECIMAL PHONE NUMBERS

26

THE INDUSTRY LINE

26

PHONE NUMBERS TAKE ON NEW STYLE

26

FREE TO USE

26

PHONE COMPANY INCENTIVE

27

WARNING ABOUT OTHER POSSIBLE APPROACHES

28

INDUSTRY NUMBERS

29

CONCENTRATED CONTRASTS

HEX ON THE BLACK KEYS

DECIMAL IS SUB SET OF HEXADECIMAL

29

HEXADECIMAL PHONE NUMBER AVAILABILITY

30

EXAMPLES OF NUMBERS

30

WHO IS LISTENING TO WHAT

31

AVOIDING PUBLIC CONTROL CODE EXCHANGES

31

OPTIONAL AREA CODE

32

17. --- APPLICATIONS ---

BACKGROUND OF AUTHOR

34

TOUCH TONE AND YOU

35
HEXADECIMAL NUMBERING SYSTEM
36
HEXADECIMALS AS IN 6 EXTRA
37
AGED ATTITUDE
37
PROOF EXTRAORDINARY
37
HEXADECIMAL NUMBER APPLICATIONS
38
NETWORK IS INTACT, NO CHANGES ARE NEEDED
39
PUBLIC EXAMINED UP CLOSE AND PERSONAL
39
GENERALLY SPEAKING
39
ENLIGHTENED PUBLIC
39
TECHNICALLY EXPERIENCED PUBLIC
40
PUBLICLY SPEAKING FROM MY SOAP BOX
40
CALIFORNIA ENACTED POOR QUALITY LAW
41
OBSOLETE EQUIPMENT
41
EQUIPMENT MANUFACTURERS WILL COMPLY
42
URGENT REQUEST FOR TEST LINES
43
ALLEGIANCE TO NO ONE
44
NUMBER SYSTEM DESIGNATIONS
44
HOW PUBLIC AND HOW PRIVATE

45	
CONTAMINATION DEFINED	
45	
AB818 BACKGROUND	
45	
HEXADECIMAL SOLUTION PERSPECTIVE	
46	
SERVICE SPECIFIC APPLICATIONS	
48	
TOLL FREE	
48	
BUSINESS SERVICES NUMBERS	
50	
LOCAL NUMBERS	
51	
PAY STATIONS	
51	
EMERGENCY ADVANTAGE AT LONG LAST	
52	
ALARM SIGNAL LINES	
52	
MILITARY AND PUBLIC EMERGENCIES	
52	
OTHER PHONE COMPANIES	
53	
HEARING IMPAIRED COMMUNICATIONS	
54	
CORPORATE PLANTS AND SECURED LOCATIONS	
54	
PHONE COMPANY BUSINESS OFFICES AND REPAIR SERVICES	
54	
EMERGENCY SERVICES	
55	
PUBLIC INTEREST, CPUC, ALJ, AND FCC	
55	
FRIED GREEN HEXADECIMALS SERVED ON TOAST	

55

TELEPHONE COMPUTER PROGRAMMING

56

NIGHTMARE ON TONE PAD AVENUE

60

DIAL PAD RELATIONS WITH THE COMPUTER

60

Figure 1: Dual Tone Multiple Frequency Tone Pad

61

WHY NOT MORE DIGITS

62

ISSUE PROFILE

62

WARNING: Reminder, the ALPHABET column is for perspective only

63

REQUEST: We need to have the phone tone pads changed

63

TABLE 1: == PHONE SYSTEM SYMBOL TABLE ==

64

Figure 2: Dual Tone Multiple Frequency Tone Pad

65

TOO MANY NUMBERS

66

Base 10 DECIMAL

67

Base 16 HEXADECIMAL

67

18. 3: CONCLUSION AND RECOMMENDATIONS -----

19. --- CONCLUSION ---

P R O AND C O N

68

Pro:

68

Con:

68

COMPLIANT, COMPATIBLE, CONFIGURABLE, AND CONFOUNDING

69

Compatible:

69

Configurable:

69

Confounding:

70

20. --- RECOMMENDATIONS ---

TELEPHONE EQUIPMENT MODIFICATIONS

70

HEXADECIMALS AND MANURE

71

POLITICAL, ADMINISTRATIVE LAW, FEDERAL AND STATE COMMISSIONS

72

PUBLIC Perception

72

SEGREGATING SERVICES

73

GENERAL PUBLIC

74

WAY TO RELIEF IS PAVED AND EASILY ACCESSIBLE

74

HOLLYWOOD PAGING COMPANY

74

NORTH COUNTY AREA CODE

75

PUBLIC HEXADECIMAL NUMBER PERMUTATIONS OF * AND #

76

COMPANY CURIOSITY CONFOUNDS CALLING

77

FOREIGN COUNTRY RELATIONS

78

COMPETITOR NUMBER ASSIGNMENT BLOCKS CAN BE INDIVIDUAL NUMBERS

79

NAY SAYERS AND OTHER SNAFUS

79
LOBBY MONEY
80
DISOBEDIENCE IS PREFERRED TO SUBMISSION
80
SIGNAGE AND OTHER PUBLIC DISPLAYS
81
SECURITY AND HEXADECIMALS
82
PUBLIC SERVICE ANNOUNCEMENTS FOR HEXADECIMAL PHONE NUMBERS
83
TONE COMBINATIONS ARE A NATIONAL SYSTEM STANDARD
83
SCOPE OF RULE MAKING DECISION
83
PERIPHERAL BENEFITS IN RELATION TO THIS PROPOSAL
83
EQUIPMENT MANUFACTURERS WILL COMPLY
84
BROUHAHA, COMPLEXITIES, AND PERPLEXITY SNAFUS
84
ABSURDITY OF HAND CHANGING CUSTOMERS TO AREA CODES
84
HEXADECIMAL LINE DANCE
85
HEXADECIMAL NUMBER COMBINATIONS
87
ADOPTION AS A NATIONAL STANDARD, NANP REVISED
88
EQUIPMENT OBSOLESCENCE AND TIME TO REPLACE
88
WHERE WILL IT WORK AND WHY THE DELAYS
90
WHAT LITMUS TEST SHOULD WE APPLY TO THIS PROPOSAL
90
INDUSTRY ACCESS DATA IMPERATIVE TO COMPLETE ACCURATE PICTURE

91	LEGAL PRACTICE IN PRO PER
92	RISK ASSESSMENT AND OTHER POLITICALLY CORRECT ACTIVITIES
93	CONTRASTING DECIMAL AND HEXADECIMAL NUMBERS
93	DECIMAL LINE NUMBER DISCUSSION
94	NOTE: Telephone persons have contributed
96	TO BE OR NOT TO BE
96	STAMPEDE TO MOVE OR RELUCTANCE OR JUST WHEN CONVENIENT
98	COMMENTARY AND ANALYSIS
100	WHAT STANDARD IS APPLICABLE
101	COMMENTARY AND ANALYSIS
102	DOES THE PUBLIC HAVE UNLIMITED RIGHT TO PARTICIPATE
102	DEALING WITH CAUSE AND EFFECT
103	FORMAL APOLOGIES DUE THE AMERICAN PEOPLE AND ME
104	EVERY INTERVENOR SHOULD BE OFFENDED
105	EQUIPMENT LEGISLATION REQUIREMENTS
105	WITH REGARD TO THE NEW TYPE NUMBERS
106	HOW TO TELL WHEN TO DIAL THE AREA CODE
106	TABLE OF THREE DIGIT CODES

107

This is the 0 page for 3 digit codes

109

This is the 1 page for 3 digit codes

110

This is the 2 page for 3 digit codes

111

This is the 3 page for 3 digit codes

112

This is the 4 page for 3 digit codes

113

This is the 5 page for 3 digit codes

114

This is the 6 page for 3 digit codes

115

This is the 7 page for 3 digit codes

116

This is the 8 page for 3 digit codes

117-118

This is the 9 page for 3 digit codes

119

This is the A=0 page for 3 digit codes

120

This is the B=* page for 3 digit codes

121

This is the C=# page for 3 digit codes

122

This is the D page for 3 digit codes

123

This is the E page for 3 digit codes

124

This is the F page for 3 digit codes

125

21. 4: RULEMAKING AND GOVERNMENTS -----

22. --- RULEMAKING ---

ISSUE - ELECTRONIC PUBLISHING

126

ISSUE - ORIGINAL TOUCH TONE / DTMF

126

ISSUE - PHONE NUMBER RECEIVERS

127

ISSUE - CURRENT AREA CODE LOADS

127

ISSUE - PLAINT EQUIPMENT TO COMPLETE INSTALLATION

128

ISSUE - HEXADECIMAL SUCCESS RECORDED ANNOUNCEMENT

129

ISSUE - WARNING ISSUED TO ALL INDUSTRIES

129

ISSUE - REQUEST A LEGAL OPINION BY CPUC ATTORNEY

129

ISSUE - BEGIN A NEW INVESTIGATION AND RULEMAKING

130

WHAT THE RULES OUGHT TO BE

130

23. --- GOVERNMENTS ---

FEDERAL BROUHAHA IS BREWING

131

PHONE COMPANIES IN PERSPECTIVE, PHASORS DRAWN AND SET ON STUN

131

COMPETENT CONSULTANTS COUNT AND IT SHOWS

133

24. 5: PRAYER AND SUBMISSION -----

25. --- PRAYER ---

INTERVENOR OFFERS PRAYER

134

26. --- SUBMISSION ---

ORDER OF THE COURT

135

HEXADECIMALS HERE TO STAY

135	
STANDARD NOT NOVEL	
135	
REQUEST FOR NEW PROCEEDING	
135	
HISTORICALLY AND OFFICIALLY	
136	
COMPLINACE WITH THE ORDER OF THE COURT	
136	
CONCLUDING REMARKS	
137	
CHALLENGE OF POWER	
137	
SUBMISSION	
137	
VERIFICATION	
138	
CERTIFICATE OF SERVICE	
139	
ACKNOWLEDGMENTS AND CREDITS	
140	

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28. T I T L E:

COMMENTS ON AND DIALING PROPOSAL FOR THE EXPANDED USE OF
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THAT WILL ALLEVIATE THE AREA CODE ASSIGNMENT CRUNCH AND PROVIDE
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** A Comprehensive Treatise on the HEXADECIMAL Number Perspective

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29. ----- PART 1: INTRODUCTION AND DEFINITIONS -----

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30. --- INTRODUCTION ---

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31. FORWARD - This is about the conservation of PHONE NUMBER resources, the efficient uses of the existing resource, and implementation of a program that involves the creation of the INDUSTRY class of service that will serve as the vehicle to expand the use of HEXADECIMAL PHONE NUMBERS into every area code and prefix and line number that already exist in the presently assigned area codes. No new DECIMAL area codes need be assigned!

32. THE NEILL PROGRAM - This program is visionary in nature, and practical in application. It was first conceived as early as 1984 and expressed in a technical report to the Phone Company in 1988. Nothing has ever come of this proposal as it languishes in some folder on a computer for all these many years.

33. WE ARE NOT ALONE - The continued addition of area codes, became a rallying point for people nationwide who are seeking state and federal legislation to protect them from more area codes. Readers are encouraged to search several national newspapers: Christian Science Monitor, Wall Street Journal, Washington Post, Los Angeles Times, San Francisco Examiner and Chronicle, and USA Today for writings on this subject.

34. INTERNET PUBLICATIONS ABOUND - The Internet is alive with good information. Please see the authors web site at

35. URL: <<http://www.webcom.com/electro7/hex/hex.html>>.

36. Senator Bowen's site page is located at

37. URL: <[http://www.sen.ca.gov/htbin/testbin/
member_infodated?sen.senator.bowen.
area](http://www.sen.ca.gov/htbin/testbin/member_infodated?sen.senator.bowen.area)>.

38. No known pages on the CPUC web site are known to provide any information on this subject or actions contemplated to address these issues.

39. The FCC has provided some information on the web at their site:

40. <http://www.fcc.gov/Bureaus/Common_Carrier/Notices/1999/fcc99122.txt>

41. HEXADECIMAL PHONE NUMBERS - Most recently, with the expansion of area codes in California, and in the immediate vicinity of San Diego, now with 4 area codes in the county, the issue of using HEXADECIMAL PHONE NUMBERS again rises to the surface for consideration. So many are unhappy with the expansion of area codes that it is no wonder renewed interest in this program is at an all time high. With the efforts of California Legislators to pass laws that require some public relief from so many area codes at hand, it is time to formally pursue HEXADECIMAL PHONE NUMBERS as the best, if not the only acceptable form of relief.

42. HEX ON THE BLACK KEYS - Consider the PHONE system to be a piano. The white keys we use, the black keys are ignored. We soon learn there are not enough tones to produce the music we want using only the white keys. My argument is to use the black keys along with the white ones. Furthermore, the black keys are distributed and intermingled with the white keys throughout the keyboard. This makes it very easy to use both as we see fit. This is by far the better approach; it is better than adding more new pianos (DECIMAL area codes).

43. HARVESTING THE HEXADECIMAL FRUIT - Unfortunately, nothing is without risk or time. Some, but not all aspects of this issue

will take years to harvest the fruit of the HEXADECIMAL tree. I have a friend with a young, 4' orange tree. This tree produced 7 oranges this last year. In 10 years, this tree will be 20' x 30' and will produce 200 to 400 oranges.

43. EXPANDING EXISTING USE - This proposal calls for the expanded use of HEXADECIMAL PHONE NUMBERS, just like the orange tree, it will produce some fruit now, but lots and lots more later. There are growing pains with any expansion, but we, as a society, are smart enough to realize the need, find a solution, and implement it in a timely fashion.

44. EXHAUSTING NANP - This is the effect that will affect the exhaust term projected for NANP. So great is this effect that it will lengthen the life of the NANP to over 100 years. By that time, we will have solved the multiline problems and no other changes to the phone system will ever be necessary.

45. ON THE RECORD AT LAST - Notwithstanding the issues of state's rights versus federal preeminence by law, this forum will produce well deserved discussions and conclusions that will provide the trier of fact with a good background and a significant collection of applicable facts with which, at the very least, can result in a on-the-record resolution action of the FCC/CPUC and form the basis for further legislative action by this state's legislature and may even prompt similar actions by other states as well. We can all be proud of California for leading the way in America. We have all had enough! This is the first formal action on HEXADECIMAL phone numbers that I know of in America. Lead on, lead on!

46. SUPPORT IS WHERE YOU FIND IT - The author has already solicited and received the support of elected officials: state senators and assembly members as well as federal senators and representatives. These elected officials have felt the heat of disgruntled constituents and feel the need not only to follow

this proceeding, but also to position them to act in the PUBLIC interest on this issue.

46. An informed citizenry is a powerful citizenry. Today what we don't know can cost us a ton of money, allow legislation to happen that will curtail our freedoms, threaten the constitution and negate our vote. Democracy happens only when an informed, engaged and concerned electorate takes responsibility. It's not enough to cast a vote and then let "Bill," do It. Today we must keep tabs on those men and women we sent to government. We deserve the kind of government we get, because we decide at the ballot box.

47. EXHAUSTIVE EXPLORATION ASSURES CONFIDENCE IN RULE MAKING PROCESS - This discussion is in response to the CPUC's own motion for rule making on the subject of Area Codes. Notwithstanding that title, it behooves us all to realize that no meaningful discussion or debate can be had without a thorough and exhaustive examination of each of the underlying elements that support the issue at hand. To fail to do so, or limit the scope, would forever prejudice any conclusion drawn due to insufficient exploration and determination of every aspect of the issue. This is so very important, it is repeated: It's better to debate a question without settling it, than to settle a question without debating it.

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48. --- DEFINITIONS --- Some Are Unique Definitions - (Phone Jargon)

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49. CENTRAL OFFICE - Switch Room is used the same as Central Office, but now there are no switches and it is not an office!!!! This is the location of the Prefix computers. All phone lines

come into this building from parts of the city or county.

49. DECIMAL NUMBER SET - This is what we all use, 0,1,2,3,4,5,6,7,8,9, in our daily lives, but is not true in phone dialing.

50. DIRTY SET - The so called decimal phone number set is dirty, because it includes the HEXADECIMAL digit: 0=A but does not include true zero 0. It is part decimal and part HEXADECIMAL.

51. DTMF - Dual Tone Multiple Frequency - Use of two simultaneous voice band tones for dialing. Also known as touch-tone was introduced in about 1962.

52. ENLIGHTENED PUBLIC - These people page and use voice mail every day. They are contemporary players in the know. This Proposal does not subject them to undue requirements or challenges.

53. EXHAUST - No, it is not your car, it is a term to identify that we are approaching a time when all available numbers have been assigned in an area code. The 213 area code is exhausted so a new area code must be assigned. This applies to area codes as well. We will exhaust the remaining area codes available, not yet assigned, in less than 20 years.

54. EXPANDED USE OF HEXADECIMALS - The system already uses HEXADECIMALs, as in 0=A and *=B and #=C. This Proposal simply demands their expanded use.

55. GENERAL PUBLIC - Especially older folks and those not known to be players. This Proposal protects them, fully.

56. HEXADECIMAL NUMBERING SYSTEM AND SET- The HEXADECIMAL Set (0, 1, 2, 3, 4, 5, 6, 7, 8, 9, A, B, C, D, E, F) where the 2 digit: 10=A=0, 11=B=*, 12=C=#, 13=D, 14=E, and 15=F NUMBERS have